



Peter Pattakos <peter@pattakoslaw.com>

Huang v. OSU

Peter Pattakos <peter@pattakoslaw.com>
To: "Corl, Christina" <CCorl@plunkettcooney.com>
Cc: Zoran Balac <zbalac@pattakoslaw.com>

Tue, Mar 28, 2023 at 12:01 PM

There is no legitimate basis for excluding Dr. Lubit. His treatment of Ms. Huang has been timely disclosed and she has the right to introduce the testimony of her treating physician.

Peter Pattakos
The Pattakos Law Firm LLC
101 Ghent Road
Fairlawn, OH 44333
330.836.8533 office; 330.285.2998 mobile
peter@pattakoslaw.com
<https://pattakoslaw.com/>

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On Tue, Mar 28, 2023 at 11:56AM Corl, Christina <CCorl@plunkettcooney.com> wrote:

Defendants intend to move to exclude Dr. Lubit. Sorry.



Christina L. Corl

Plunkett Cooney
Attorneys & Counselors at Law
T 614.629.3018 C 614.309.9212

[bio](#) | [office](#) | [vcard](#) | [web](#)

From: Peter Pattakos <peter@pattakoslaw.com>
Sent: Tuesday, March 28, 2023 11:05 AM
To: Corl, Christina <CCorl@plunkettcooney.com>
Cc: Zoran Balac <zbalac@pattakoslaw.com>
Subject: Re: Huang v. OSU

[EXTERNAL]

It is doubtful that I will be able to get my hands on the records by the end of this week but if it helps I can tell you that it is my understanding that Dr. Lubit will testify that Rizzoni has caused substantial harm to Ms. Huang. I will get you the records ASAP. Thanks.

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The Pattakos Law Firm LLC

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Fairlawn, OH 44333

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On Tue, Mar 28, 2023 at 8:59AM Corl, Christina <CCorl@plunkettcooney.com> wrote:

I need the records asap so that I can determine how to proceed. Please have them to me by week's end. Thanks.



Christina L. Corl

Plunkett Cooney
Attorneys & Counselors at Law
T 614.629.3018 C 614.309.9212

[bio](#) | [office](#) | [vcard](#) | [web](#)

From: Peter Pattakos <peter@pattakoslaw.com>
Sent: Tuesday, March 28, 2023 10:59 AM
To: Corl, Christina <CCorl@plunkettcooney.com>
Cc: Zoran Balac <zbalach@pattakoslaw.com>
Subject: Re: Huang v. OSU

[EXTERNAL]

Hi Christina,

Ms. Huang has recently received treatment from psychiatrist Dr. Roy Lubit, whose testimony we intend to introduce at trial regarding damages. This course of treatment began about two weeks ago. I am working on getting you copies of the records of this treatment and hope to have that for you within the next week or two. Please let me know if you would like to take Dr. Lubit's deposition before trial so we can get that on the calendar.

Thank you,

Peter Pattakos

The Pattakos Law Firm LLC

101 Ghent Road

Fairlawn, OH 44333

330.836.8533 office; 330.285.2998 mobile

peter@pattakoslaw.com

<https://pattakoslaw.com/>

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On Thu, Mar 23, 2023 at 6:32AM Peter Pattakos <peter@pattakoslaw.com> wrote:

Thanks. Will be in touch next week.

Peter Pattakos

The Pattakos Law Firm LLC

101 Ghent Road

Fairlawn, OH 44333

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peter@pattakoslaw.com

<https://pattakoslaw.com/>

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On Thu, Mar 23, 2023 at 6:06AM Corl, Christina <CCorl@plunkettcooney.com> wrote:

Thank you.

You may add whatever language you wish with respect to settlement when you complete plaintiff's portion of the final pretrial order. And yes I believe the order is due on the 4th. I will look for your further comments by the 31st.

Christina L. Corl

Plunkett Cooney
Attorneys & Counselors at Law
T 614.629.3018 C 614.309.9212

bio | office | vcard | web

Christina L. Corl

Plunkett Cooney

Direct dial: 614-629-3018

Cell: 614-309-9212

On Mar 22, 2023, at 10:42 PM, Peter Pattakos <peter@pattakoslaw.com> wrote:

[EXTERNAL]

Hi Christina,

Thanks for sending these documents. Our pretrial order is due on April 4, correct? Assuming this date is correct I will aim to get you our portions of the order by March 31 and we can revise as necessary from there before finalizing and filing. I appreciate your patience and understanding as we simply do not have the fluency with the file that you have due to our late entry to the case.

I can add for now that if you insist on telling the Court that "settlement negotiations have been at an impasse for some time" then I would have to add that this is only due to your clients' choices. Since I have come on as Plaintiff's counsel she reduced her demand by more than half, despite zero offer from the University, from \$4M to \$1.95M. I also told you when we last spoke on the phone that she would reduce her demand by half again, into the six figures, if your client would only agree to come to five figures, yet still there has not been a penny offered. Since the Court has asked about settlement negotiations, the record needs to be clear at least as to that much.

I hope you find this sufficient to address your communications to date and I trust that you will otherwise advise.

Thanks again,

Peter Pattakos

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Fairlawn, OH 44333

330.836.8533 office; 330.285.2998 mobile

peter@pattakoslaw.com

<https://pattakoslaw.com/>

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On Wed, Mar 22, 2023 at 9:49AM Corl, Christina <CCorl@plunkettcooney.com> wrote:

Peter, attached please find case specific jury instructions and verdict forms, along with an updated joint final pretrial order.

Please advise when you intend to respond to my communications and prepare Plaintiff's portion of the final pretrial order.

Thanks.

<image001.jpg>

Christina L. Corl

Plunkett Cooney
Attorneys & Counselors at Law
T 614.629.3018 C 614.309.9212

[bio](#) | [office](#) | [vcard](#) | [web](#)